

# EXHIBIT A



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April 12, 2021

**VIA ELECTRONIC MAIL**

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**Re: *In Re: Valsartan Products Liability Litigation, MDL No. 2875***

Dear George:

This letter is on behalf of Defendants to address the status of depositions and discovery relating to the bellwether plaintiffs.

**Bellwether Plaintiff Deposition Dates**

As you are aware, Defendants requested deposition dates for ten bellwether plaintiffs on February 2, 2021. See Letter from Greenberg Traurig to Pl's Counsel, dated February 2, 2021. Those depositions are now underway, and we would like to move forward with scheduling the remaining plaintiffs for deposition. Please provide proposed deposition dates for the remaining plaintiffs no later than April 20, 2021.<sup>1</sup> Please also provide an attorney contact for each plaintiff for purposes of coordinating logistics and scheduling. We expect you will forward this letter on to the appropriate counsel representing these plaintiffs.

| Plaintiff     | Plaintiff's Counsel                                   |
|---------------|---|
| Joe Briones   | Mueller Law Office                                    |
| Janice Brown  | Daniel Nigh<br>Levin Papantonio                       |
| Nellie Dawson | Paige Boldt<br>Watts Guerra LLP                       |
| Lana Dufrene  | Gainsburgh, Benjamin, David, Meunier & Warshauer, LLC |

<sup>1</sup> Our ability to agree on the dates is subject to whether there are enough records collected to proceed with the depositions on the proposed dates.

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|                  |   |
|------------------|---|
| Robert Garcia    | Ellen Presby                              |
| Maxine Guillory  | Daniel Nigh<br>Levin Papantonio           |
| Nabil Hanna      | Mueller Law Office                        |
| Paulette Kennedy | Hollis Law Firm                           |
| Silvano Kinkela  | Davis & Crump, P.C.                       |
| Robert Lee       | Linville Johnson, PLLC                    |
| Ronald Meeks     | Daniel Nigh<br>Levin Papantonio           |
| Georgia Murawski | Goldenberg Law                            |
| Marvella Ochs    | Oliver Law Group                          |
| Evons Smalls     | Daniel Nigh<br>Levin Papantonio           |
| James Stephens   | Williams Hart                             |
| James Suits      | Harrison Davis Steakley Morrison Jones PC |
| Michael Svebek   | Davis and Crump                           |
| Durl Welch       | Paige Boldt<br>Watts Guerra LLP           |

### **DFS & Rule 34 Discovery**

Plaintiffs have requested that the DFSs be completed at all levels at least seven (7) days prior to a bellwether plaintiff deposition. *See* Pl's CMC Submission, dated March 23, 2021. The parties are continuing to confer on this issue. *See* electronic correspondence between Mr. Nigh and Greenberg Traurig, dated April 5 and 6, 2021. As noted in our April 6, 2021 email to Mr. Nigh, Defendants are willing to agree to this proposal so long as Plaintiffs likewise agree that they will respond to any bellwether plaintiff case-specific discovery requests within fourteen (14) days of service. Please confirm you are amenable to this agreement.

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**Treating Physician Deposition Protocol**

Defendants would like to begin scheduling the depositions of the bellwether plaintiffs' prescribing and treating physicians. Defendants will send Plaintiffs a proposed case management order addressing communications with, and depositions of, Plaintiffs' prescribing and treating physicians.

Sincerely,



Victoria Davis Lockard, Esq.

Cc:

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